

FILED

November 6, 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

By: RR
Deputy

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

Case No: SA:24-CR-00550-OLG

UNITED STATES OF AMERICA

Plaintiff

v

(1) NORBERTO GONZALEZ

and

(2) MIGUEL GONZALEZ

Defendants.

INDICTMENT

**COUNT 1: 18 U.S.C. § 933(a)(2) & (3)
Firearm Trafficking Conspiracy**

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. § 933(a)(2) & (3)]

On or about September 25, 2024, to October 8, 2024, in the Western District of Texas, the defendants,

**(1) NORBERTO GONZALEZ,
(2) MIGUEL GONZALEZ,**

and others, did conspire to receive at least one firearm, to wit: a FN Herstal model MK 16 MOD 0 rifle, 5.56x45 mm caliber, serial number L011140, and a FN Herstal model MK 16 MOD 0 rifle, 5.56x45 mm caliber, serial number L010493, from another person in or otherwise affecting interstate or foreign commerce, knowing or having reasonable cause to believe that such receipt would constitute a felony, to wit: possession of a machinegun, in violation of Title 18, United States Code, Section 933(a)(2) & (3).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See Fed. R. Crim. P. 32.2]

Firearm Violation and Forfeiture Statutes

I.

[Title 18 U.S.C. § 933(a)(2) and (3) subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the criminal violation set forth in Count One, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of certain property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

Title 18 U.S.C. § 924. Penalties

(d)(1) Any firearm or ammunition involved in or used in any knowing violation of . . . section 933 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

II.

[Title 18 U.S.C. § 933(a)(2) and (3) subject to forfeiture pursuant to Title 18 U.S.C. § 934(a)(1)(A) and (B)]

As a result of the criminal violation set forth in Count One, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of certain property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 934(a)(1)(A) and (B), which state:

Title 18 U.S.C. § 934. Forfeiture and Fines.

(a) Forfeiture. --

(1) In general. -- Any person convicted of a violation of section 932 or 933 shall forfeit to the United States, irrespective of any provision of State law--

(A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and

(B) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation . . .

III.

Personal Property

This Notice of Demand for Forfeiture includes but is not limited to the following property:

\$17,620, more or less, in U.S. Currency.

A TRUE BILL.



FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

A handwritten signature in dark ink, appearing to read 'Z. Parsons'.

BY: _____

Zachary W. Parsons
Assistant U.S. Attorney